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6 *Attorneys for Debtor and*
7 *Debtor in Possession*

8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11 **In re:**

12 **JADOOTV, INC.,**

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15 **Debtor.**
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Bankruptcy Case No. 19-41283 (WJL)

Chapter 11

**DEBTOR'S STATEMENT OF NON-
OPPOSITION TO MOTION OF THE
UNITED STATES TRUSTEE, PURSUANT
TO 11 U.S.C. § 1112(b) AND FEDERAL
RULES OF BANKRUPTCY PROCEDURE
1017(f) AND 9014, TO CONVERT OR
DISMISS CHAPTER 11 CASE**

[Related to Dkt. No. 422]

Date: February 8, 2022

Time: 10:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 220
1300 Clay Street
Oakland, CA 94612

1 JadooTV, Inc., as debtor and debtor in possession (the “Debtor”) in the above-captioned
2 Chapter 11 case (the “Chapter 11 Case”), hereby submits this statement of non-opposition to the
3 *Motion of the United States Trustee, Pursuant to 11 U.S.C. § 1112(b) and Federal Rules of*
4 *Bankruptcy Procedure 1017(f) and 9014, to Convert or Dismiss Chapter 11 Case*, filed on
5 January 9, 2023 [Dkt. No. 422] (the “Motion”). For the reasons set forth in the Motion and further
6 discussed below, the Debtor believes dismissal, and not conversion, of the Chapter 11 Case would
7 be in the best interests of the estate and its creditors. Counsel for the Debtor has conferred with
8 counsel for the United States Trustee, and they have agreed on a form of order to be submitted by
9 the United States Trustee concurrently with the United States Trustee’s filing of a certificate of no
10 opposition pursuant to L.B.R. 9014-1(b)(4)(B).

11 As described in the *Declaration of Sajid Sohail in Support of First Day Motions and Related*
12 *Relief* [Dkt. No. 10], the Debtor filed this Chapter 11 Case because of the negative impact that
13 copyright and patent infringement litigation brought by DISH Network LLC and certain related
14 parties (such litigation collectively, the “DISH Litigation,” and such copyright action currently
15 pending in the Northern District of California, the “Copyright Action”) had on the Debtor’s sales
16 revenue and legal expenses. The Debtor has continued to operate its business during the Chapter 11
17 Case for nearly four years, while performing the reporting and other duties required of it as a debtor
18 in possession. However, as reflected in its monthly operating reports, after relief from the automatic
19 stay was granted to DISH in January 2020, the Debtor’s cash position has gradually decreased, in
20 part due to the legal fees and management attention spent on the DISH Litigation and the continuing
21 negative impact of the DISH Litigation on the Debtor’s sales.

22 As stated in prior filings, because the claims of DISH represent such a major contingency, it
23 is not feasible for the Debtor to propose a plan of reorganization until the DISH Litigation is finally
24 resolved, either through settlement or a final judgment in the Copyright Action. While deadlines for
25 discovery and dispositive motions have been set in the Copyright Action, no trial date has been set,
26 and the parties remain at an impasse with respect to settlement.

1 The Debtor agrees with the United States Trustee that dismissal and not conversion would
2 be in the best interests of the estate and its creditors. The disputed claim of DISH accounts for the
3 overwhelming majority of the claims asserted against the Debtor, and conversion of the Chapter 11
4 Case would not resolve DISH's claim and would negatively affect any recoveries available to
5 prepetition creditors after administrative claims have been paid. Dismissal will allow the Debtor to
6 continue to operate its business and defend the DISH Litigation without the administrative burden
7 of the bankruptcy case.

8 For the reasons set forth above, the Debtor does not oppose the United States Trustee's
9 request that the Court enter an order granting the Motion and dismissing the Chapter 11 Case.

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12 Dated: January 25, 2023

KELLER BENVENUTTI KIM LLP

13 /s/ Jane Kim

14 Jane Kim

15 *Attorneys for Debtors and Debtor in Possession*
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